## **REMARKS**

Applicant respectfully requests the consideration of the following remarks and the reconsideration of the application.

Claims 1-120 were rejected under 35 U.S.C. 102(b) as being anticipated by Robotham (U.S. Patent 6,704,024). Applicant respectfully disagrees.

The present application was filed on June 14, 2001. However, Robotham was issued on March 9, 2004. The application for Robotham was published February 7, 2002. Both publication dates were later than the filing date of the present application. Thus, Robotham was not published more than one year before the filing date of the present application.

Note that 35 U.S.C. 102(b) shows:

"A person shall be entitled to a patent unless —

. . .

(b) the invention was patented or described in a printed publication in this or a foreign country or in public use or on sale in this country, more than one year prior to the date of the application for patent in the United States, or ..."

Thus, Robotham is not a prior art under 35 U.S.C. 102(b). The rejection under 35 U.S.C. 102(b) is clearly improper.

Further, Robotham does not show each and every aspect of the pending claims. For example, claim 73 recites:

73. (previously presented) A method to view Internet content, the method comprising:

sending from a device to a remote server a request for a web page;

receiving at the device from the remote server in a compressed format at least a portion of an image of the entire web page, the portion of the image being rendered at the remote server from information including text;

selectively displaying the portion of the image on a display of the device according to a user input to the device; and automatically displaying the portion of the image on the display of the device in response to a user input to return to the web page.

Claim 73 was rejected because "the claim is analogous to claim 22". Applicant respectfully disagrees. Claim 22 does not recite the limitation of "automatically displaying the portion of the image on the display of the device *in response to a user input to return to the web page*". The rejection for claim 73 is clearly improper. Robotham does not show "selectively displaying the portion of the image ..." and "automatically displaying the portion of the image ... in response to a user input to return to the web page".

Further, for example, claim 75 recites:

75. (previously presented) The method of claim 73, wherein the portion of the image comprises an area of the image last displayed for the web page before the user input to return to the web page.

Claim 75 was rejected because "the claim is analogous to claim 74". Applicant respectfully disagrees. Claims 74 and 75 are clearly different. Further, although Fig. 13A of Robotham shows two arrow icons, Robotham does not provide any indication as to what these icons are. Further, Robotham does not show "automatically displaying the portion of the image on the display of the device in response to a user input to return to the web page", where "the portion of the image comprises an area of the image last displayed for the web page before the user input to return to the web page". Note that returning back to a previously visited

web page does not necessarily returning back to the same area that was last selectively displayed according to user input.

## Claim 5 recites:

5. (previously presented) A system as claimed in claim 1 wherein information about the last area displayed in the device browser window is stored in memory on the device for the web page, wherein upon returning to the web page, said last area displayed appears first in the device browser window.

The Office Action relied on Col. 10, lines 14-40, of Robotham for the rejection of claim 5. However, Col. 10, lines 14-40, of Robotham relates to "a specific sub-region of the proxy display surface" and "the viewport". It does not show "information about the last area displayed in the device browser window is stored in memory on the device for the web page"; and it does not show "upon returning to the web page, said last area displayed appears first in the device browser window".

## Claims 78 and 9 recite:

- 78. (previously presented) A method to serve Internet content, the method comprising:
  - storing on a server information about a plurality of frequently visited locations of a web page for a remote device, the plurality of frequently visited locations being identified through user inputs to the remote device;
  - receiving at the server from the remote device a request for the web page;
  - rendering at least a portion of an image of the entire web page from information defining the web page, the portion of the image including the plurality of frequently visited locations;

transmitting in a compressed format the portion of the image from the server to the remote device in response to the request for the web page.

9. (previously presented) A system as in claim 1 wherein: web pages and corresponding areas frequently viewed by the user are stored on the host computer such that, when the address of a frequently viewed web page is entered on the device, the device sends a message containing the web page address to the host computer, which recognizes this frequently viewed web page and automatically sends corresponding areas frequently viewed to the device.

The Office Action relied on Col. 10, lines 14-27, of Robotham for the rejection of claims 9 and 78. However, Col. 10, lines 14-40, of Robotham relates to "a specific sub-region of the proxy display surface" and "the viewport". It does not show "recognizes this frequently viewed web page and automatically sends corresponding areas frequently viewed to the device". It does not show "storing on a server information about a plurality of frequently visited locations of a web page for a remote device, the plurality of frequently visited locations being identified through user inputs to the remote device".

For example, claim 1 recites:

- 1. (previously presented) A system for viewing Internet content, the system comprising:
  - a portable device; and
  - a host computer coupled to the portable device through a communication link;
  - wherein the host computer receives information defining a web page from outside and renders said information into an image of the

web page in memory of the host computer in response to a request for the web page from the portable device, said information including text and graphics;

- wherein a software program running on the device implements a device browser window with icons which are fixed with respect to a device browser window;
- wherein the host computer reduces the color depth of a portion of the image of the web page which portion is proportional to the size of the device browser window, digitally compresses and transmits the portion of the image of the web page to the device, where the portion of the image of the web page is decompressed and stored into a display memory on the device for display;
- wherein the device enables a user to scroll the image of the web page
  inside the device browser window and sends a message to the
  host computer informing the host computer scrolling operations
  occurred in the device browser; and
- wherein when a part of the image of the web page is brought into the device browser window but has not been sent to the device, the part of the image of the web page is sent from the host computer to the device.

However, Col. 9, lines 4-16, of Robotham does not show "the device enables a user to scroll the image of the web page inside the device browser window and sends a message to the host computer informing the host computer scrolling operations occurred in the device browser". Col. 9, lines 4-16, of Robotham shows the operation of the server 22. The server 22 has a proxy display surface 28, which can be set to a particular size. The content inside the proxy display surface 28 is rendered. The rendering process at the server 22 of Robotham does not show the operation at the device that "enables a user to scroll the image of the web page

inside the device browser window and sends a message to the host computer informing the host computer scrolling operations occurred in the device browser".

For example, claims 10 recites:

- 10. (previously presented) A method to view Internet content, the method comprising:
  - sending from a device to a remote server a first request for a first web page;
  - automatically receiving at the device from the remote server in a compressed format a first portion of a first image of the entire first web page;
  - displaying, on a display of the device, at least a part of the first portion of the first image of the entire first web page;
  - receiving, at the device, user input to display a second portion of the first image of the entire first web page;
  - user input to display the second portion of the first image of the entire first web page;
  - the second portion of the first image of the entire first web page
    only when the second portion of the first image has not been
    transmitted from the remote server to the device;
  - displaying the second portion of the first image of the entire first web page on the display of the device;
  - wherein the first and second portions of the first image of the entire first web page are rendered at the remote server from information defining the first web page; and
  - wherein at least one of the first and second portions of the first image is rendered at the remote server from information including text.

05965.P018 -- 38 --

Col. 10, lines 1-13, of Robotham does not show "receiving, at the device, user input to display a second portion of the first image of the entire first web page; transmitting, from the device to the remote server, data indicating the user input to display the second portion of the first image of the entire first web page; receiving at the device from the remote server in a compressed format the second portion of the first image of the entire first web page only when the second portion of the first image has not been transmitted from the remote server to the device".

Col. 10, lines 1-13, of Robotham show that the client 24 "determines whether to transmit notification of the user's action to the server 22 for further processing". "The server 22 interprets such events as user interface actions on its own proxy display surface 28 and responds by generating the appropriate events and/or actions on its display surface 28, which is transmitted to client 24 for display thereon." (Col. 10, lines 5-9, Robotham). Thus, one understands that the server 22 provides updated images generated on its display surface 28. In Robotham, the client 24 selectively notifies the server about the user's action; and the server unconditionally transmits back an updated image. This process is different from recited limitation. In claim 10, "transmitting, from the device to the remote server, data indicating the user input to display the second portion of the first image of the entire first web page" and "receiving at the device from the remote server in a compressed format the second portion of the first image of the entire first web page *only when* the second portion of the first image has not been transmitted from the remote server to the device".

Similarly, claim 22 recites:

22. (previously presented) A method to serve Internet content, the method comprising:

receiving at a server from a remote device a first request for a first web page;

· }

rendering a first portion of a first image of the entire first web page from information defining the first web page;

- selectively transmitting from the server to the remote device in a compressed format the first portion of the first image of the entire first web page for display on a display of the remote device;
- receiving, at the server from the remote device, data indicating user input to display a second portion of the first image of the entire first web page on the remote device;
- rendering the second portion of the first image of the entire first web page from the information defining the first web page;
- portion, transmitting from the server to the remote device in a
  compressed format the second portion of the first image of the
  entire first web page only when the second portion of the first
  image has not been transmitted from the server to the remote
  device;

wherein at least one of the first and second portions of the first image is rendered at the server from information including text.

Col. 10, lines 1-13, of Robotham does not show "responsive to the data indicating the user input to display the second portion, transmitting from the server to the remote device in a compressed format the second portion of the first image of the entire first web page only when the second portion of the first image has not been transmitted from the server to the remote device".

Other independent claims recite limitations similar to those discussed above. Since dependent claims incorporate the limitations of the claims from which they depend, the pending claims are patentable over Robotham at least for the above reasons.

· • •

Please charge any shortages or credit any overages to Deposit Account No. 02-2666. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

Dated:  $/\gamma/\nu$ , 2004

Lehua Wang Reg. No. 48,023

12400 Wilshire Boulevard Seventh Floor Los Angeles, California 90025-1026 (408) 720-8300